REMARKS:

Status

After entry of this amendment, claims 1 to 14, 16 to 26, and 28 to 34 will be pending, with claims 17 to 20 withdrawn from consideration. Claims 1 and 21 are the independent claims. Claims 1, 2, 7, 8, 14 and 21 have been amended herein, and claim 27 has been canceled herein.

Rejections

Claims 1, 3, 7-21, and 26-34 are rejected as unpatentable under 35 USC 103(a) over US Patent 6,801,936 to Diwan ("Diwan") in view of US Patent 6,594,699 to Sahai et al ("Sahai") and further in view of US Patent 6,980,175 to Narayanaswami ("Nara"). Claims 4-6, and 23-25 u are rejected as unpatentable under 35 USC 103(a) over Diwan in view of Sahai, further in view of Nara, and further in view of US Patent 6,272,532 to Fienleib ("Feinlaub"). Applicants respectfully traverse these rejections.

Diwan, Sahai, and Nara, alone or in combination, do not disclose or suggest the features of independent claim 1, at least with respect to the claim limitations highlighted in claim 1 below:

> 1. A method for customizing a structured markup language document and delivering said customized structured markup language document to an internet appliance, comprising:
> parsing information units in an original structured markup language document;
> selecting one or more of said information units for delivery;
> creating in a database a second structured markup language document including said one or more of said information units, said second structured

markup language document customized according to capabilities of and for delivery to said internet appliance;

delivering to said internet appliance a menu for selection of at least said second structured markup language document, said menu including as a selection item at least a bookmark representing said second structured markup language document; and

delivering said second structured markup language document to said internet appliance.

Claim 1 has been amended herein to replace the word "identifying" in the first method step with "parsing".

Applicants' method for customization and delivery of structured markup language documents addresses the problem of presenting the full content of web sites with various internet appliances. As discussed at page 2 of the application, website publishers may provide specialized editions of websites accessible through specialized gateways, such as "stripped down" web pages accessible through a wireless access protocol gateway. However in many cases these specialized web sites are not available, and those that are available typically do not permit users to select which web site elements are included or excluded.

Embodiments of Applicants' method for customizing and delivering a structured markup language document are discussed at page 7, line 28 to page 8, line 23. Applicants' method enables users to customize selected web content for later access via an internet appliance. A document system 106 processes structured markup language documents, parsing these documents into a series of inter-related information units. Common types of information units include text, graphical images, executable application programs ("applets"), and embedded links. The component

information units are stored in a database 107, through which document manager 106 can manipulate these information units to create a customized structured markup language document.

The capabilities of Applicants' document manager to parse information units, store the information units in a database, and use selected information units to create customized structured markup language documents, enables users to create documents that are suitable for delivery to given internet appliances. For example, a particular internet appliance may have a limited display capacity that is incompatible with certain information units that comprise graphical images. Applicants' method of creating bookmarks for customized structured markup language documents (discussed at page 12, line 11 to page 13, line 13 of the application) helps users select information units that are compatible with such limited display capacity.

The Office Action cites Diwan as teaching the step of identifying information units in an original structured markup language document. This step is herein amended to recite parsing instead of identifying.

Diwan teaches system that gathers information from multiple sources and packages the information in customized bundles for delivery to subscribers. The system receives subscriber requests for different types of information, and stores rules for delivering the information to subscribers using IP multicast techniques. Types of information providers mentioned by Diwan include a web news site such as NBC.com that broadcasts streams of news information, and providers that transmit multicast information such as Weather.com.

In Diwan's system, an agent stores subscriber requests and rules regarding delivery of information to subscribers; cf. Fig. 3. Examples of subscriber requests given at col. 4, lines 52-60 include stock quotes for GTE stock, weather conditions for Boston, NBA scores, and news headlines concerning Fortune 500 companies. Examples of rules at col. 4, line 61 to col. 5, line 12 include for example whether a subscriber wants an agent to provide partial orders; intervals for information delivery; and format of information delivery (e.g. text vs. audio). Diwan also provides manager rules, ground rules for efficient operation of the agent.

Considering the passages from Diwan cited in the Office action and other teachings from Diwan summarized above, Diwan does not disclose or suggest parsing information units in an original structured markup language document. Diwan does not teach parsing a structured markup language document into inter-related information units such as text, graphic images, application programs (applets), and embedded links. Diwan discloses an agent that acts upon subscriber requests and rules to selectively deliver information to subscribers. In contrast, the document manager of the present application enables users -- not just website authors -- to parse information units in structured markup language documents.

Diwan also does not teach or suggest selecting one or more of said information units for delivery. Diwan teaches subscriber requests and rules to guide the agent in bundling information from multiple sources for delivery, and discussed above. Diwan does not however teach selecting information units, parsed from an original structured markup language document, for delivery. Diwan's examples of subscriber requests and rules include specific and general types of information,

and information formats such as text and audio. The application of these requests (information types) and rules by Diwan's agent does not teach or suggest the selection of individual information units parsed from an original structured markup language document, for delivery. By enabling users to select individual information units and not just general or specific information categories, the document manager of the present application provides greater control over the characteristics of a structured markup language document containing the selected information units.

For similar reasons, Diwan does not teach or suggest the step of creating in a database a second structured markup language document including said one or more of said information units. This is not just because Diwan does not teach customizing a structured markup language document according to the capabilities and for delivery to an internet appliance. Diwan does not teach the underlying technique of storing in a database information units that were parsed from an original structured markup language document and selected for delivery, as a resource for creating in that database a second structured markup language document. As discussed above, Diwan's database stores subscriber requests (types of information desired) and rules for information delivery, which Diwan's agent uses in creating customized bundles. Even if Diwan's customized bundle were interpreted to be equivalent to the claimed second structured markup language document -- a point which Applicants do not conceded – Diwan does not teach the selection of information units parsed from an original structured markup language document for inclusion in such customized bundle.

The Office action cites Sahai as teaching a system that adapts media formats to client capabilities and adapts the streaming process according the client capabilities. The Office action

relies on Sahai for the feature of claim 1 of said second structured markup language document customized according to capabilities of and for delivery to said internet appliance. Applicants respectfully traverse the position that Sahai teaches said second structured markup language document customized according to capabilities of and for delivery to said internet appliance.

As stated in passages cited in the Office action, Sahai's "system for capabilities based multimedia streaming over a network" adapts media format and streaming process to the capabilities of a client. Sahai's server processor receives client-processor capabilities and user preferences from the client, responding to request for service by streaming data to the client based upon such client capabilities and user preferences. The server may request "capabilities" data upon receiving a request URL, or the data may be sent with each request. In addition to passages from Sahai cited in the Office action, examples of such capabilities are given at col. 3, lines 23-60. Examples of user preferences as described at col. 4, lines 9-31.

Sahai does not teach the use of these client capabilities and user preference data to customize a structured markup language document using information units. Rather, the client capabilities and user preference data is used by the server to decide resource allocations for streaming of data. Examples of such resource allocation decisions are given at col. 4, lines 41-63. These examples and Sahai as a whole do not teach or suggest customization of structured markup language documents, using information units in a database.

The Office action sites Nara as to delivering to said internet appliance a menu for selection of at least said second structured markup language document, said menu including as a

selection item at least a bookmark representing said second structured markup language document. Nara teaches customizing a PC, PDA, or cell phone for a user and maintaining the customizations with bookmarks, among other types of customization. However, Nara does not teach the use of bookmarks to represent either an original structured markup language document (cf. claim 8) or a customized structured markup language document (per claim 1). Nara is concerned with transferring bookmarks and other customizations of a computer to a second computer – not with the use of bookmarks in customization of documents for delivery to a computer such as an internet appliance.

For the reasons given above, Diwan, Sahai, and Nara, alone or in combination, do not disclose or suggest the discussed features of claim 1.

Diwan, Sahai, and Nara, alone or in combination, do not disclose or suggest the features of independent claim 21, at least with respect to the claim limitations highlighted below:

> 21. (Currently Amended) A document customization system, comprising:
>
> a management server offering a document customization service to a user;
>
> a document manager associated with said management server for performing said document customization service to web pages identified by said user, said document customization service customizing said web pages according to capabilities of and for delivery to an internet appliance, said document customization service parsing information units in structured markup language documents for said web pages and enabling the user to select one or more of said information units for delivery to the user;
>
> a database accessible by said document manager, said database storing customized web pages resulting from said document manager performing said document customization service; and
>
> a portal for accessing said customized web pages in said database via bookmarks representing at least said customized web pages.

Claim 21 is herein amended in the document manager element to recite "said document customization service parsing information units in structured markup language documents for said web pages".

The above arguments distinguishing Diwan, Sahai and Nara as to claim 1 also apply generally to the document customization system of claim 21. The current amendment of claim 21 reinforces these arguments. Thus the arguments as to the parsing and selection steps of claim 1 apply as well to the feature of claim 21 of "said document customization service parsing information units in structured markup language documents for said web pages and enabling the user to select one or more of said information units for delivery to the user". The arguments as to the "creating in a database" step of claim 1 also apply to the feature in claim 21 of "a database accessible by said document manager, said database storing customized web pages resulting from said document manager performing said document customization service".

Turning to the dependent claims, claims 29-32 (dependent from claim 21) recite features of the database accessible by the document manager. This database provides additional useful features of applicant's document customization system in its tracking of data relating to users, clients, devices, and interrelationships of these entities. Applicants respectfully submit that the passages from Diwan cited in the Office action relative to claims 29-32 are not appropriate. Diwan does not address the basic purpose of applicant's invention of customizing web pages in a manner compatible with delivery to an internet appliance. Diwan's database, in tracking data relating to subscriber requests and rules regarding delivery of information, does not

track the information described in claim 29-32.

Arguments in Previous Response

Applicants acknowledge that the Examiner has not found the other arguments presented in the previous response to be persuasive. However, Applicants wish to make clear that Applicants believe those arguments are valid and therefore wish to preserve those arguments in the record, for example in terms of the prosecution history of this case as it might be applied to any future litigation involving the application and any patent(s) that may issue thereon.

No Admission

Applicant's decision not to argue each of the dependent claims separately is not an admission that the subject matter of those claims is disclosed or suggested by the applied art.

Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at (614) 205-3241. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

/Steven A. Swernofsky/
Steven A. Swernofsky
Reg. No. 33,040

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Swernofsky Law Group PC
P.O. Box 390013
Mountain View, CA 94039-0013
(650) 947-0700